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DATE : January 12, 1979
TO : Joe Recchi
FROM : Pete Henault
SUBJECT: Our PCB disposal program

Our investigation regarding the best and most cost-effective method of disposing of our PCB materials has revealed the following pertinent facts:

- The transportation of hazardous materials is regulated at the Federal level by the Department of Transportation, pursuant to regulations contained in a 1200 page manual under Title 49, Code of Federal Regulations. PCB's, however, are not listed as a "hazardous material" by DOT. The EPA has no regulations governing the transport of PCB's either other than banning their distribution in commerce. **Therefore, to our knowledge, there are no federal regulations covering the transportation of PCB materials for disposal, much less anything relating to required insurance coverage.** The state has adopted the DOT regulations but there have been some indications that they will modify them during the forthcoming legislative session in such a way that they will designate PCB's as a hazardous material in Washington.
- Discussion with Interstate Commerce Commission (ICC) personnel about insurance requirements for ICC licensed carriers indicated that **ICC requires only standard insurance coverage and not Environmental Impairment Liability or other types of extensive coverage.** However, the large common carriers such as Consolidated Freight Ways, Pacific Intermountain Express, System 99 and IML Freight insure themselves for millions of dollars.
- There are only two EPA licensed PCB disposal sites in the northwest, Wes-Con in Murphy, Idaho and Chem Nuclear in Arlington, Oregon. Their respective distances from Seattle are 500 and 300 miles. Both companies have expressed a willingness to contract

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 with a trucking firm to pick up our PCB material in Seattle and haul it to the respective disposal site, absolving us of any responsibility for the material after it is loaded on the truck. Steve Karich of Chem Nuclear cited a probable cost per shipment to Arlington of only \$700/load with disposal cost fixed at \$4.65/ft.³

In conclusion, it appears that sending disposal bids, which would specify picking up, hauling and disposing of our PCB materials, to both Wes-Con and Chem Nuclear would be the simplest way of dealing with this situation. We will continue to work with Materials Management personnel to resolve this issue.

WR:rm

cc: Vickery
Mandapat/Young
Tuffs
Henault (3)
Riley
File